

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

JANE DOE 1, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
vs.	§	Cause No. 6:16-cv-173-RP
	§	
BAYLOR UNIVERSITY	§	
	§	
Defendant.	§	

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW PLAINTIFFS, and file this Unopposed Motion for Extension of Time as follows:

1. On March 27, 2019, Defendant Baylor University filed a First Amended Motion to Compel the Production of Documents [ECF 605]. Plaintiffs request an extension of time until April 9, 2019 to respond to this Motion. The Defendants do not oppose this request.

2. Plaintiffs request additional time due to the volume of arguments Defendant advances and the complex history of discovery in this case. Also, Plaintiffs' counsel has been in a nonstop court ordered settlement conference with the State of Texas in another federal case since the motion was filed. See Case No. 5:19-cv-00074-FB; *Texas League of United Latin American Citizens et al v. Whitley et al.*

CONCLUSION

Plaintiffs respectfully pray that the Court will extend the time for filing a response to April 9, 2019.

Dated this 3rd day of April, 2019.

Respectfully submitted,

BRAZIL & DUNN, L.L.P.

/s/ Chad W. Dunn

Chad W. Dunn
State Bar No. 24036507
3303 Northland Dr., Suite 205
Austin, Texas 78731
Telephone: (512) 717-9822
Facsimile: (512) 515-9355
chad@brazilanddunn.com

K. Scott Brazil
State Bar No. 02934050
13231 Champion Forest Dr., Suite 406
Houston, Texas 77069
Telephone: (281) 580-6310
Facsimile: (281) 580-6362
scott@brazilanddunn.com

DUNNAM & DUNNAM, L.L.P.

Jim Dunnam
State Bar No. 06258010
4125 West Waco Drive
Waco, Texas 76710
Telephone: (254) 753-6437
Facsimile: (254) 753-7434
jimdunnam@dunnamlaw.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

The undersigned counsel certifies that prior to filing this motion, he conferred with counsel for Defendant who advised him that the attached proposed Order is unopposed.

/s/ Chad W. Dunn

Chad W. Dunn

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing motion has been sent via the Court's electronic filing system to counsel for Defendant on April 3, 2019.

/s/ Chad W. Dunn

Chad W. Dunn